

2025 CALIFORNIA LAND RECYCLING CONFERENCE
TRANSFORMING LAND, EMPOWERING COMMUNITIES

Overcoming Challenges on Brownfields – A Developer's Perspective

SPEAKERS AND AFFILIATIONS

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OFFICE OF BROWNFIELDS
Department of Toxic Substances Control - Cleanup In Vulnerable Communities Initiative



**CENTER FOR CREATIVE
LAND RECYCLING**
RECLAIM. CONNECT. TRANSFORM.

Brian Bencz

SVP LAND OPERATIONS LENNAR

Lennar's Approach

Lennar's approach to acquiring and developing communities is consistent and unchanging in the current climate

Identify community housing needs as well as structural, environmental and aesthetic improvements that will result in a safe, desirable community to look at and live in. This includes the acquisition of sites with environmental challenges. Lennar views these sites as an opportunity to provide an environmental benefit through the process of remediation, provide housing to help meet RHNA needs, and often at a workforce housing price point.



Feasibility of Potential Projects

Ideal Potential Properties?

- Underutilized properties (4+ acres) with housing overlays for feasible residential redevelopment, may or may not require remediation and/or mitigation

How can municipalities attract interest?

- By providing confidence and clarity regarding redevelopment standards
- By communicating a desire to work with the developer to approve / provide new housing

What allows time and money savings? What are some of the greater challenges?

- At the municipality level, a willingness to collaboratively work towards project approvals with defined process and timeline
- At the oversight agency level, significant challenges consist of determining timeline, cost of obtaining acceptable site characterization & delineation, and finally obtaining consistent clean up goals.

Inconsistent OMM Requests for similar site conditions: *diffuse soil vapor plume and new residential homes*

Site	Prior Use	PCE maximum shallow soil vapor concentration (ug/m ³)	Soil vapor clean-up goal (ug/m ³)	VIMS w/OMM?	Pre-occupancy Indoor Air required?	VIMS Monitoring Frequency
A	Light industrial	16,000	460	Yes (and SVE)	Yes – then No	Semi-annual (years 1 & 2), annual years (3-5)
C	Orchards (off-site source)	6,000	15 then 460	Some	No	Quarterly (year 1), semiannual (year 2), annual (3-5)
D	Commercial	500	460	Some (previous SVE)	No – then Yes	Semi-annual (years 1 & 2), annual years (3-5)

Feasibility of Potential Projects cont.

Where does funding projects come from?

- Internal funding

Major Challenges facing projects?

- Determining what ongoing obligations will be – excessive investigation/characterization

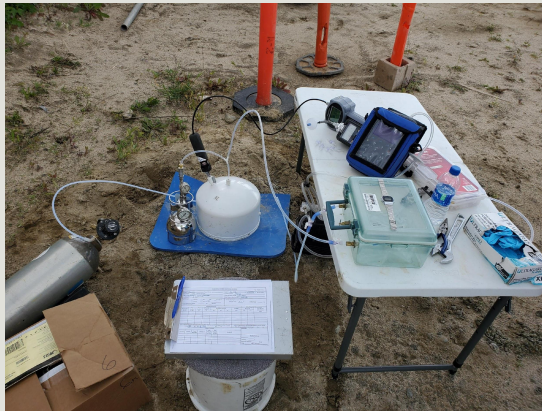
How do recent CEQA changes affect your projects?

- Any CEQA exemption can be helpful, although the recent change only fits a narrow band of potential redevelopment sites

La Palma – Anaheim Successful Cleanup

Environmental challenges

- Elevated PCE, TPH, lead and Arsenic levels
- 3 UST removals
- Extensive remediation



City of Carson Success Story – Carson Kott

- Former Car Dealership
- Environmental Issues – UST removal, VIMS,
- Affordable Housing Initiative – 32 Homes





Overcoming Challenges on Brownfields – A Developer's Perspective

Rose Olson, Senior Vice President
Related California Affordable

September 16, 2025

Related California

One of the largest developers and operators of affordable, mixed-income housing & market rate housing on the West Coast

16,000+ affordable homes completed

8,000+ affordable homes in pipeline

140+ LIHTC properties

70+ public-private partnership



Background & Context

Challenges

- Available land
 - Often “excess” or “surplus” public land
 - Land donated “as is”
- Funding sources and timing
 - Must compete for funding – funding applications require a Phase I ESA and Phase II if needed
 - Can add a large up front cost before you have any funding commitment
 - “Readiness” deadlines to close construction financing and start construction
- Financial Partners
 - Tax credit equity investor is in the ownership structure – doesn’t want liability
 - Once you have tax credits have to be able to demonstrate to lenders and investors site is developable and understand any costs to remediate/mitigate



Project Example

43 Units of 100% affordable senior housing

- Available land
 - Land was offered through an RFP process by the local housing authority
 - Church partner contributed adjacent land
- Considerations:
 - Both parcels had lead in soil
 - Both parcels had VOCs in soil vapor due to offsite source – kept Church lot as surface parking
 - Need for multiple agencies – lead in soil removal oversight (County), and approval of Vapor Intrusion Mitigation System (Regional Water Quality Control Board)
 - Lead in soil to be removed before acquisition and construction start; VIM system to be designed, permitted and approved before construction start



Takeaways / Lessons Learned

- Due diligence is critical; increased understanding of regulatory process and how to navigate now required for affordable housing developers
- Work closely with public agency partners to understand the environmental issues for the site early in the process and how those affect the project timeline and cost
- Balance priority to build housing quickly, safely and cost effectively with increasingly challenging land





Overcoming Challenges on Brownfields – A Developer's Perspective

Manasi Chavan | Manager, Global Environmental & Engineering

September 16, 2025

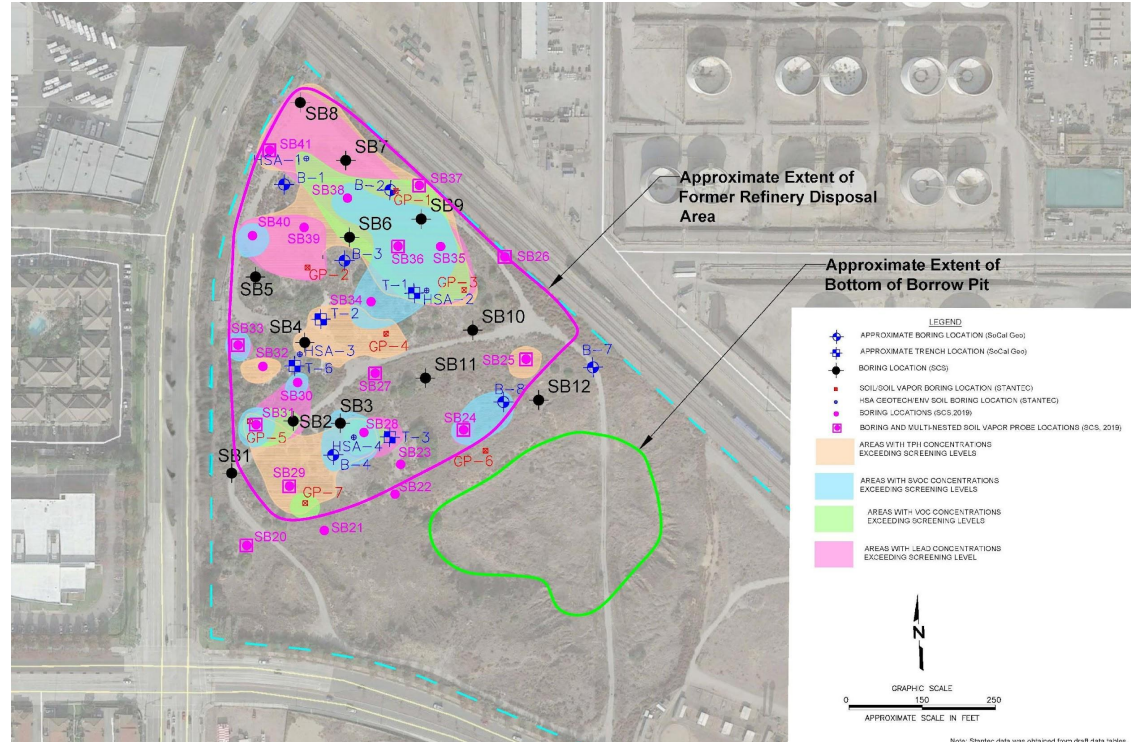
GOALS



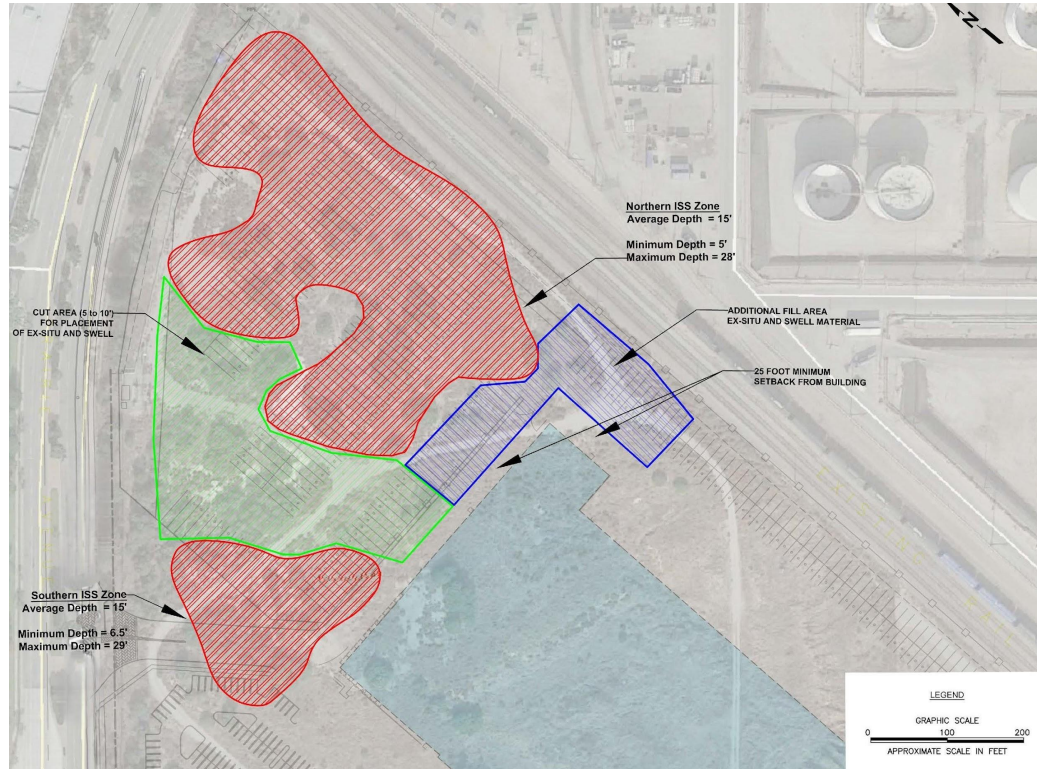
- Complete site remediation to enable development
- Establish limited liability protection
- Identify appropriate response action that meets RWQCB's Resolution 92-49 requirements

OBSTACLES

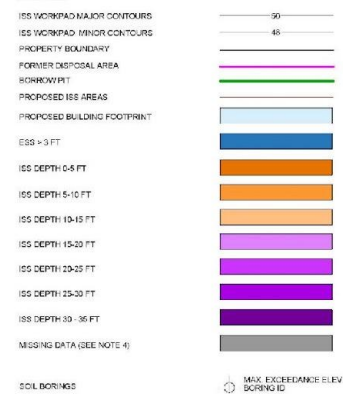
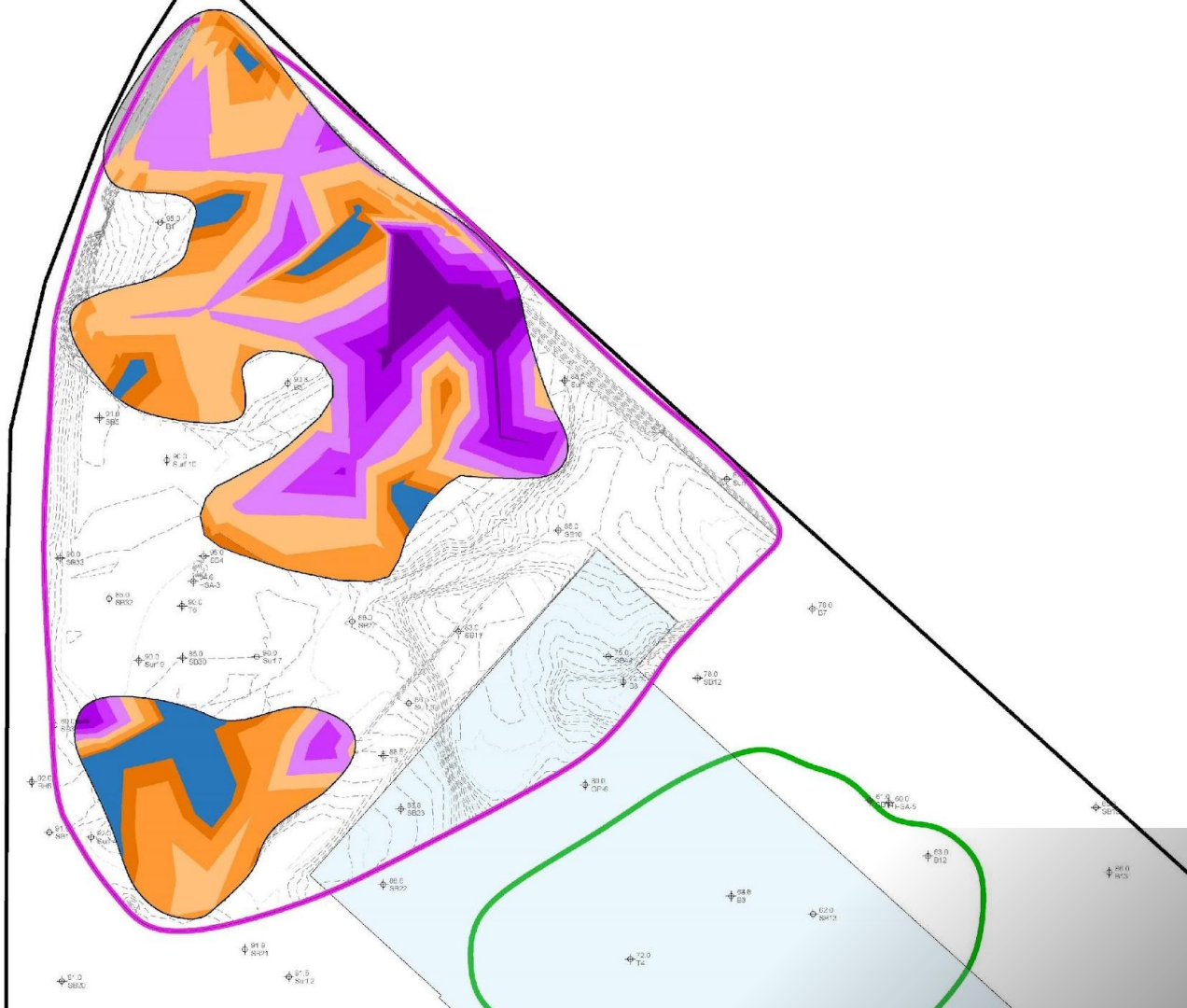
- Historical use
- Nature and extent of contamination
- Regulatory requirements
- Multiple stakeholders



STRATEGY

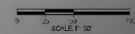


- Liability protection
- Stakeholder engagement
- Risk-based modeling and bench scale testing



NOTES

1. BASEMAP DATA PROVIDED BY GCS BASED ON JULY 2024 FIGURES.
2. THE DATA DEPICTED HEREIN ARE BASED ON NORTH AMERICAN DATUM OF 1983 (NAD83) FOR HORIZONTAL AND GEOMETRIC CONTROL DATUM AND NORTH AMERICAN VERTICAL DATUM 1985 (NAVD85).
3. PROPOSED ISS WORKPAD SURFACE IS BASED ON 5 FEET BELOW THE PROPOSED FINAL GRADE TO ALLOW FOR 5 FEET OF CLEAN FILL ABOVE THE TOP OF ISS. ISS WORKPAD WILL BE DESIGNED FOR A MAXIMUM SLOPE OF 2% IN ISS AREAS FOR EQUIPMENT STABILITY PURPOSES. ISS QUANTITIES MAY CHANGE +/- 10% FROM THIS DRAW TO FIELD CONDITIONS.
4. FINAL GRADE SURFACE DOES NOT OVERLAP WITH PROPOSED ISS AREAS.





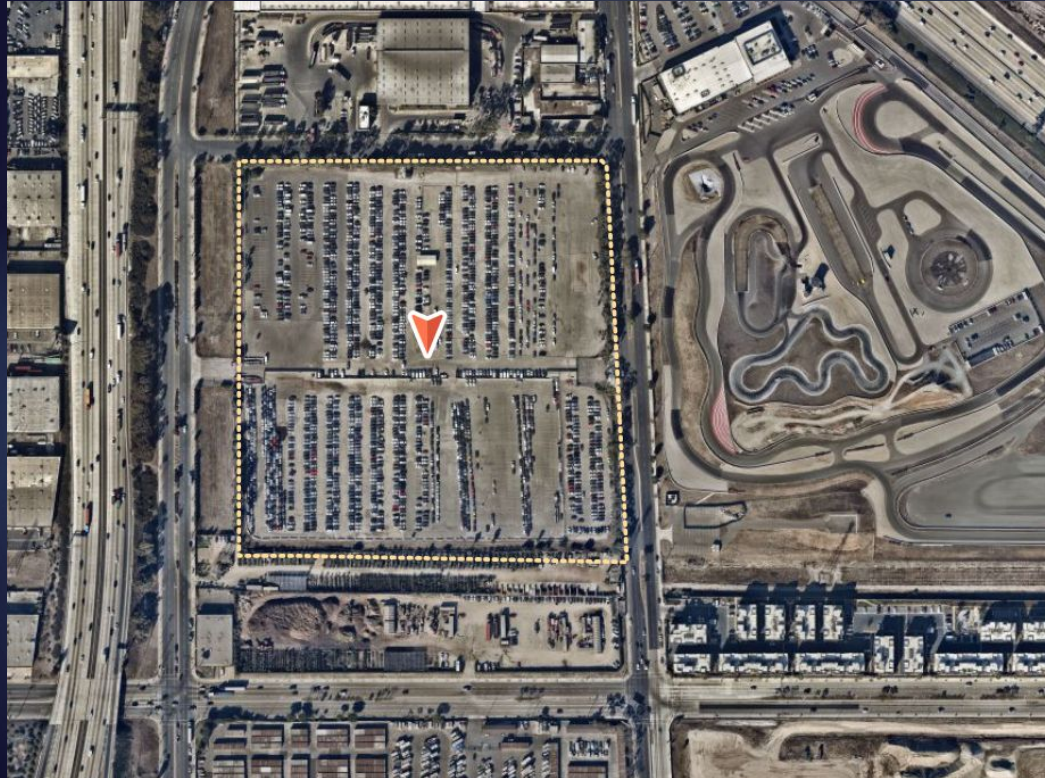
Carson, CA

Overview

- ~92,000 RESIDENTS (~140,000 DAYTIME POPULATION)
- 19 SQUARE MILE AREA IN SOUTH BAY REGION OF LOS ANGELES COUNTY
- INDUSTRIAL DEVELOPMENTS & BROWNFIELDS (E.G., FORMER LANDFILLS, REFINERIES, OIL WELLS, LOGISTICS & PORT RELATED USES)
- MAJOR DESTINATIONS / LANDMARKS: CSUDH, DIGNITY HEALTH SPORTS PARK (LOCATION VENUE FOR SEVERAL LA 2028 EVENTS), PORSCHE EXPERIENCE CENTER, AND GOOD YEAR BLIMP

20151 S. Main Street Development

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In 2001, the City completed a ranking of sites city-wide.

Of the top 25 high priority sites, this 24-acre site was ranked 1st overall after considering environmental issues for known contamination or public risk and highest potential redevelopment impact.

Remains undeveloped, but major progress in recent years.

Multi-Agency, Multi-Phase Partnership

20151 S. Main Street

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Timing / Funding Source	\$ Amount	Primary Funded Activities
July 2022 ECRG Round 1	\$315,000	Preliminary Endangerment Assessment & Oversight
March 2024 ECRG Round 2	\$375,000	Supplemental Site Investigation (SSI), Oversight, Community Engagement
May 2025 ECRG Round 1 Amendment	\$236,000	Removal Action Workplan (RAW), Human Health Risk Assessment & More
TBD Est. 2026 US EPA Revolving Loan Fund?	TBD	TBD / Clean Up Design & Implementation
2026 to 2028 Private Funds	TBD	Development Construction funded by Developer
Beyond 2028 Carson ED Benefits Agreement	\$18,000,000	Post-Construction / Operations sales tax rebate via City of Carson Economic Development Benefit Agreement

- City is committing future sales tax generated onsite if reuse is “high quality retail” or “grocery store” of at least 100,000 sq. ft. as defined in the Economic Development Benefits Agreement
- Developer committed to providing end use among other benefits including local hiring



CITY OF CARSON
The Jewel of the South Bay

City of Carson Fiscal Health Initiatives

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Funding Mechanism	What Does it Fund?
Development Agreements	General Fund and more
Development Impact Fees (DIF)	Infrastructure (e.g., new parks, roads, government facilities, beautification, utilities)
Community Facilities District (CFD)	Services (e.g., tree & road maintenance, public safety)
Brownfield & Related Grants	Environmental Assessment, Investigation, & Clean Up
Enhanced Infrastructure Financing District (EIFD)	Infrastructure (e.g., environmental remediation, affordable housing, and economic development)
Community Benefits	To be Determined
Inclusionary Housing or In-Lieu Fees	Affordable Housing
Commercial & Industrial Linkage Fees	Affordable Housing

- Revenues from these development-based funding mechanisms may provide funds to assist in environmental remediation, affordable housing, and economic development.



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Transforming Land, Empowering Communities
September 16-18, 2025 | Carson, CA



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Department of Toxic Substances Control | Cleaning Up Hazardous Contamination Sites

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THANK
YOU!



**TOGETHER WE
EMPOWER
COMMUNITIES
THROUGH THE
TRANSFORMATION
OF BROWNFIELDS**

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photos, insights and highlights!

*We appreciate your feedback,
follow this QR code to submit
an evaluation form on Whova.*
